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 Attorneys for Defendant Holder Construction Group, LLC

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

SONNY GUBBINE,)	Case No. 2:21-cv-02078-JAD-EJY
)	
Plaintiff,)	STIPULATION AND ORDER TO
)	EXTEND SCHEDULING
v.)	ORDER DEADLINES
)	(Eighth Request)
HOLDER CONSTRUCTION GROUP,)	
LLC, a Georgia Limited Liability Company;)	
TEG STAFFING, INC. d/b/a EASTRIDGE)	
WORKFORCE SOLUTIONS, a California)	
Corporation; DOES I-X; ROE BUSINESS)	
ENTITIES I-X,)	
)	
Defendants.)	
)	

The parties, by and through their respective counsel, hereby stipulate to extend the Scheduling Order deadlines in this case as follows:

Discovery Deadline	January 19, 2024
Dispositive Motion Deadline	February 19, 2024
Joint Pretrial Order	March 20, 2024, or 30 days from the ruling on a dispositive motion

This is the eighth request for an extension of these deadlines. The parties provide the following information about the proposed discovery deadline extension.

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Discovery Completed to Date

The parties have served their Initial Disclosures and supplements thereto. Defendant has served interrogatories and a request for production and Plaintiff has responded. Defendant has subpoenaed and received documents from TEG Staffing and several medical care providers. Plaintiff subpoenaed additional documents from TEG. Plaintiff has been deposed. Victor Aldana of TEG has been deposed. A Rule 30(b)(6) deposition for TEG has occurred. A Rule 30(b)(6) deposition of Defendant is currently scheduled for December 5, 2023.

Remaining Discovery to Be Completed

The completion of the Rule 30(b)(6) deposition of Defendant, and the depositions of James McCain, David Meeh and Dave Enzor, as well as possible further written discovery.

Reasons Discovery Could Not Be Completed Within the Existing Deadline

Defense counsel is still on a reduced work schedule due to medical issues. The three individuals mentioned above are being subpoenaed for the week of December 19, 2023, efforts to secure their voluntary appearance thus far being unsuccessful. A discovery extension to January 19, 2024 is sought in case there are any issues with service of process or the deponents have scheduling issues.

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Proposed Dates for Completion of Discovery

The parties believe they will be able to complete discovery by the proposed new date of January 19, 2024.

KEMP & KEMP

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IT IS SO ORDERED:


U.S. MAGISTRATE JUDGE

Dated: November 22, 2023

FISHER & PHILLIPS LLP
300 S. Fourth Street, Suite 1500
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